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8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

12
13 IN RE JUNIPER DERIVATIVE ACTIONS

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15 This Document Relates To:

16 ALL ACTIONS
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No. 5:06-cv-03396-JW

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**STIPULATION AND [PROPOSED]
ORDER RE BRIEFING SCHEDULE**

Date: N/A
Time: N/A
Before: Hon. James Ware

1 This Stipulation is entered into by and among Lead Plaintiffs the Indiana State District
2 Council of Laborers and HOD Carriers Pension Fund, Employer-Teamsters Local Nos. 175 & 505
3 Pension Trust Fund, and Timothy Hill, and defendants Juniper Networks, Inc., Scott Kriens,
4 Stratton Sclavos, William Stensrud, Robert M. Calderoni, Kenneth A. Goldman, William R.
5 Hearst III, Kenneth Levy, Frank J. Marshall, Vinod Khosla, Pradeep Sindhu, Robert Dykes,
6 Marcel L. Gani, Peter L. Wexler, Ashok Krishnamurthi, and Lloyd Carney (the "Defendants"), by
7 and through their respective attorneys of record.

8 WHEREAS, pursuant to the Stipulation and Order Regarding Filing of Consolidated
9 Complaint and Briefing Schedule dated February 15, 2007, the parties agreed that:

10 1. Plaintiffs shall file and serve their Consolidated Complaint no later than thirty (30)
11 days after Juniper files its restated financial statements with the Securities Exchange Commission;

12 2. Defendants shall file and serve their response to the Consolidated Complaint 45
13 days after service of the Consolidated Complaint;

14 3. Plaintiffs shall file and serve their opposition within 45 days after service of
15 Defendants' response; and

16 4. Defendants shall file and serve their reply 21 days after service of the opposition;

17 WHEREAS, Plaintiffs filed their Consolidated Complaint on April 11, 2007, and

18 WHEREAS, Plaintiffs have agreed to extend the Defendants' time to respond to the
19 Consolidated Complaint;

20 NOW, THEREFORE, the parties hereby stipulate, and request the Court to order, as
21 follows:

22 1. Defendants shall file and serve their response(s) to the Consolidated Complaint on
23 or before June 15, 2007; and

24 2. Plaintiffs shall file and serve their opposition within 45 days after service of
25 Defendants' response(s); and

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3. Defendants shall file and serve their reply 21 days after service of the opposition.

IT IS SO STIPULATED.

DATED: May 22, 2007

WILSON SONSINI GOODRICH & ROSATI, P.C.
NINA F. LOCKER
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/s/ Joni Ostler
JONI OSTLER

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Attorneys for Defendants

I, Joni Ostler, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Regarding Filing of Consolidated Complaint and Briefing Schedule. In compliance with General Order 45, X.B., I hereby attest that Travis E. Downs III has concurred in this filing and gave me express permission via e-mail dated May 22, 2007 to sign his electronic signature below.

DATED: May 22, 2007

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
TRAVIS E. DOWNS III
BENNY C. GOODMAN II

/s/ Travis E. Downs III
TRAVIS E. DOWNS III

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* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: May 25 2007


THE HONORABLE JAMES WARE
UNITED STATES DISTRICT JUDGE